

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff,

Plaintiff,

v.

KOREA EXCHANGE BANK, et al.,

Defendant.

Adv. Pro. No. 11-02572 (CGM)

**NOTICE OF MOTION OF DEFENDANT
KOREA EXCHANGE BANK TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that, upon Defendant Korea Exchange Bank's Memorandum of Law in Support of Its Motion to Dismiss the Complaint, the accompanying Declaration of Richard A. Cirillo dated May 16, 2022, and the exhibits thereto, the Amended Complaint dated June 6, 2012, attached hereto as an exhibit, and all prior pleadings and proceedings herein, defendant Korea Exchange Bank will move this Court at 10:00 am (Daylight Savings Time) on September 21, 2022, for an order dismissing the Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and

12(b)(6), as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Stipulation and Order in this proceeding, the plaintiff shall respond to this motion by July 18, 2022 and Korea Exchange Bank shall reply by August 17, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Korea Exchange Bank does not consent to the entry of final orders or judgment by this Court.

Dated: New York, NY
May 16, 2022.

Respectfully submitted,

/s/ Richard A. Cirillo

Richard A. Cirillo

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